

STEVEN D. BAUER
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Attorney for Defendant: **JOSHUA S. YNIGUEZ**

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA.

Plaintiff,

V.

**JOSHUA S. YNIGUEZ,
CLYDE TYNES, JR.**

Defendants.

Crim. S-05-080 WBS

**STIPULATION AND ORDER
CONTINUING STATUS
CONFERENCE**

It is hereby stipulated between counsel for the government and counsel for the defendant that the Status Conference presently scheduled for September 14 2005 may be continued until September 28, 2005, at 9:00 a.m. for further status and/or change of plea.

It is further stipulated by the parties that time is excludable under the Speedy Trial Act until September 28, 2005 pursuant to Local Code T-4.

This continuance is necessary to permit counsel to prepare. Counsel for the government and the defendant's are close to a resolution of the matter but further discussions between counsel and the clients is necessary. In light of the foregoing, additional time will be required in order for the defense to prepare. See 18 U.S.C. §3161(h)(8)(A) and 3161(h)(8)(B)(iv). Counsel for the government and the co-defendant have authorized the signing of this stipulation.

1 (Signature and Order on Following Page)

2 Dated: September 12, 2005

Dated: September 12, 2005

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4 / s / Steven D. Bauer

/ s / Fred Dawson

5 **STEVEN D. BAUER**
Attorney for Defendant

FRED DAWSON
Attorney for Defendant

6 Dated: September 12, 2005

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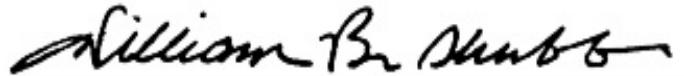
8 / s / Anne Pings

9 ANNE PINGS
Assistant United States Attorney

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11 For Good Cause Appearing
IT IS SO ORDERED

12 Dated: September 14, 2005

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15 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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